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Attorney for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HEATHER ALTMAN and ELIZA WIATROSKI,
Individually and on Behalf of All Others Similarly
Situated,

Plaintiffs,

v.

CEASERS ENTERTAINMENT, INC.,
BOARDWALK REGENCY LLC d/b/a CEASERS
ATLANTIC CITY HOTEL & CASINO, HARRAH'S
ATLANTIC CITY OPERATING COMPANY, LLC
d/b/a HARRAH'S RESORT ATLANTIC CITY
HOTEL & CASINO, TROPICANA ATLANTIC
CITY CORPORATION d/b/a TROPICANA CASINO
AND RESORT ATLANTIC CITY, MGM RESORTS
INTERNATIONAL, MARINA DISTRICT
DEVELOPMENT COMPANY, LLC d/b/a
BORGATA HOTEL CASINO & SPA, HARD ROCK
INTERNATIONAL INC., SEMINOLE HARD
ROCK SUPPORT SERVICES, LLC, BOARDWALK
1000, LLC d/b/a HARD ROCK HOTEL & CASINO
ATLANTIC CITY, and CENDYN GROUP, LLC,

Defendants.

: Civil Action No.: 1:23-cv-02536-KMW-EAP

**CERTIFICATION OF VINEET BHATIA
IN SUPPORT OF MOTION FOR
PRO HAC VICE ADMISSION**

I, Vineet Bhatia, hereby certify as follows:

1. I am a Partner with the law firm Susman Godfrey L.L.P. with offices at 1000 Louisiana Street, Suite 5100, Houston, Texas 77002.

2. I am a member in good standing of the following bars since being admitted in the years indicated: State of Texas (1996, Bar #00795976), State of New York (1991, Bar #2419273), USDC Southern District of Texas (1996, Bar #20187), USDC Northern District of Texas (1998), USDC Eastern District of Texas (2006), USDC for the District of Columbia (2010, Bar #TX0069), USDC Southern District of New York (1991, Bar # VB9964), USDC Eastern District of New York (1991). United States Court of Appeals, 9th Circuit (1992), United States Court of Appeals, 5th Circuit (2002).¹

3. I am not under suspension or disbarment by any court.

4. I have no disciplinary proceedings pending against me in any jurisdiction, and no discipline has previously been imposed on me in any jurisdiction.

5. Susman Godfrey L.L.P. does not maintain an office in the State of New Jersey.

6. I seek to appear and participate in this action on behalf of Susman Godfrey L.L.P. as counsel for Plaintiffs with Mindee J. Reuben, Joseph J. DePalma, and Catherine B. Derenze, of Lite DePalma Greenberg & Afanador, LLC who will serve as counsel of record.

7. If admitted *pro hac vice*, I will make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a).

¹ Pursuant to L. Civ. R. 101(c)(1), the following is a list of the names and addresses of the officials or offices that maintain the rolls of the members of the bars to which I am a member: The State Bar of Texas (1414 Colorado Street, Austin, TX 78701), The State Bar of New York (1 Elk Street, Albany, NY 12207), USDC Southern District of Texas (515 Rusk Street, Houston, TX 77002), USDC Northern District of Texas (1100 Commerce Street, Room 1452, Dallas, TX 75242), USDC Eastern District of Texas (300 Willow Street, Suite 104, Beaumont, TX 77701), USDC for the District of Columbia (333 Constitution Avenue N.W., Washington, DC 20001), USDC Southern District of New York (500 Pearl Street, New York, NY 10007), USDC Eastern District of New York (225 Cadman Plaza East, Brooklyn, NY 11201). United States Court of Appeals, 9th Circuit (95 7th Street, San Francisco, CA 94103), United States Court of Appeals, 5th Circuit (600 S. Maestri Place, New Orleans, LA 70130).

8. If admitted *pro hac vice*, I will make a payment of \$150.00 on admission to the Clerk, U.S. District Court.

9. If admitted *pro hac vice*, I will abide by L. Civ. R. 101(c).

10. If admitted to appear *pro hac vice* before this Court, I shall strictly observe the rules governing practice in the District of New Jersey, shall submit to the disciplinary jurisdiction of the District Court of New Jersey, and shall strictly observe the dates fixed for scheduling conferences, motions, pretrial conferences, trials or any other proceedings.

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: July 20, 2023

Respectfully submitted,



Vineet Bhatia (*pro hac vice forthcoming*)

Texas Bar No. 00795976

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